

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 2:22-cv-00125-JRG

JURY TRIAL DEMANDED

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE
TO SUPPLEMENT INFRINGEMENT CONTENTIONS**

Plaintiff Entropic Communication, LLC (“Entropic”) files this Unopposed Motion for Leave to Supplement its Infringement Contentions (the “Motion”). Entropic served its infringement contentions on Defendant Charter Communications, Inc. (“Charter”) on July 5, 2022, pursuant to Local Patent Rule 3-1 and the Docket Control Order. In January 2023, Charter produced a number of technical documents that contained information relating to the accused products and services, which upon review, necessitated a supplementation to Entropic’s infringement contentions. On February 24, 2023, Entropic notified Charter of its request to supplement its infringement contentions prior to claim construction, and conferred with Charter regarding an extension to the claim construction schedule. On February 27, 2023, Charter agreed not to oppose Entropic’s request to supplement its infringement contentions so long as Entropic did not add any new asserted claims and subject to Charter being permitted to supplementation of its invalidity contentions in view of the new infringement contentions. Entropic agreed to these terms, and it served its supplemental infringement contentions on March 10, 2023. Charter has yet to serve its supplemental invalidity contentions. On May 26, 2023, the parties conferred regarding Charter’s anticipated date for serving its supplemental invalidity contentions. Entropic conveyed to Charter that to the extent it provides supplemental invalidity contentions after June 9, 2023, Entropic may oppose such a supplementation given fact discovery closes on July 21, 2023.

Good cause exists for the Court to grant this motion. Entropic was diligent in serving Charter with its supplemental infringement contentions on March 10, 2023. These supplemental infringement contentions do not change any of Entropic’s asserted claims of infringement and were provided to Charter in advance of the exchange of claim terms for construction. Moreover, Charter does not oppose the Motion.

For these reasons, Entropic respectfully requests the Court grant its Motion.

Dated: May 26, 2023

Respectfully submitted,

/s/ James Shimota by permission Andrea Fair

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ATTORNEYS FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on May 26, 2023.

/s/ Andrea Fair

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff conferred with counsel for Defendants on February 24, 2023 and February 27, 2023, and counsel for Defendants are unopposed as to the disposition of the matters raised in this motion.

/s/ Andrea Fair